

To: Mann, Laurie[mann.laurie@epa.gov]; Zell, Christopher[zell.christopher@epa.gov]
From: Croxton, Dave
Sent: Fri 4/8/2016 4:59:31 PM
Subject: RE: DO standard talking points (for your conversation with Melissa)

Left Melissa a voicemail to the effect of your message below. Said that it was a dilemma we wanted her take on appropriate next steps. Thanks for the notes

From: Mann, Laurie
Sent: Thursday, April 07, 2016 3:35 PM
To: Croxton, Dave <Croxton.David@epa.gov>; Zell, Christopher <zell.christopher@epa.gov>
Subject: DO standard talking points (for your conversation with Melissa)

DO Standard Talking Points:

Refer Melissa to Figure 14 (page 44) in the TMDL (copied below).

- Looks like Ecology used a 1-way R for DO in this TMDL. We need to give this a closer look, but it appears that Ecology used the estimated natural condition as the TMDL target from RM 1-48 (green line), and switched to the existing condition & numeric standard (whichever is more protective) at RM 48, when the DO standard decreases from 9.5 to 8.0, even though the estimated natural condition would be more protective in the lower portion of the watershed.
- EPA staff (Chris & Laurie) have talked to Andrew & his staff at SWRO and Chad Brown about this. Chad agrees that this may be a 1-way R. Ecology asked us to talk with our standards folks about this. We have done that.
- SWRO indicated that they are willing to “fix” the TMDL, but aren’t willing do the kind of fix that would require another public notice.
- How does this interpretation of the standard mesh with the conversations Ecology is having with NWEA about the NCC provision?
- EPA is concerned that EAP staff (Mindy?) working on the Budd Inlet – Capitol Lake TMDL (downstream of this TMDL) may not be aware of the 1-way R issue, as it might be applied to DO TMDLs. Development of that TMDL is currently underway.

